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Subject: SOITEC DPEIR comments

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Soitec Solar Development Program Impact Report, Log No. PDS2012-3910-120005 ER; 3800-12-010, GPA, Tierra Del Sol, 3300-12-010 MUP, 3600-12-005 REZ, 3921-77046-01, AP, Rugged Solar, 3300-12-00 MUP, SCH No. 201212108

Comments:

1. The project as presented completely industrializes the Boulevard area. Although presented as a "commercial" project, the scale of this project is excruciatingly large and will forever scar this rural area.
2. I would like to go on record and choose the "no project alternative". The document fails to identify any other alternatives that are outside of the Boulevard area. This represents a complete failure to identify areas in which SDG&E already use for such facilities such as the Imperial Valley.
3. For a project with this magnitude, the project proponents were allowed to perform groundwater studies using San Diego County's *Guidelines for Determining Significance and Report Format and Content Requirements: Groundwater Resources* (County of San Diego, 2007). Based on the reliance and significance of groundwater use in Boulevard, the County of San Diego had the latitude to require additional testing based on the size of these projects. Additional testing could have included isotope testing to determine age of groundwater withdrawn, tracer testing to assess groundwater flow patterns, packer testing to isolate different aquifer zones, slug testing, geophysical or acoustic borehole analysis, fracture analysis of wells to determine actual size and orientation of fractures, and additional observation wells that would allow for site specific drawdown analysis rather than relying on theoretical drawdown curves.
4. One basis for the reason that groundwater use for the Tierra del Sol site was considered a less than significant impact was based on the theoretical analysis of drawdown based on non-site specific values. A value of 19.9 feet was obtained as the maximum drawdown based on a well that was "approximately" 784 feet away. The value of 19.9 feet was deemed not significant. That value was based on assumptions and approximations; therefore, should be considered significant.
5. The volume of water anticipated to be needed at each site is based on a reference site that AECOM has identified as the model for each site. Based on the importance of groundwater for Boulevard and the obvious error encountered in water need by the same consultant (Dudek) for the Eco-substation project, the County of

San Diego should have required the project proponent to attain site specific soil values for each site to refine actual water need for each site.

6. The DPEIR underestimates water demand. For both Rugged and Tierra del Sol, the construction water estimate fails to account for any water demand for many phases of Project construction, including constructing (1) substations, (2) operation and maintenance ("O&M") buildings, (3) the Tierra del Sol gen-tie, (4) the rock crushing facility, (5) undergrounded electrical equipment, (6) culverts, (7) draining, (8) fencing, and (9) foundations for anything besides CPV trackers such as invertors, transformers or poles.
7. Based on the failure to use site specific values and analyses at all sites for water use estimation, it is in the best interest of the community and native flora and fauna of Boulevard to have all project water be imported.
8. As a professional geologist licensed to practice in the State of California, I support the comments made by Dr. Victor Ponce in his white paper entitled **IMPACTS OF SOITEC SOLAR PROJECTS ON BOULEVARD AND SURROUNDING COMMUNITIES, SAN DIEGO COUNTY, CALIFORNIA** date November 15, 2013.
9. The DPEIR fails to document cumulative effects of solar trackers in stowed or horizontal position and the amount of heat that can be dispersed to neighboring properties with differing wind speeds.
10. Clearing and grubbing almost 1500 acres of land will effectively reduce amount of land available to both terrestrial and avian predators and will effectively chase rodents and other species onto neighboring properties that could have deleterious effects on their properties.
11. As a member of the Boulevard Planning Group – I support the comments and responses made by that elected body for the DPEIR.
12. Based on the deficiency of the DPEIR, I suggest re-issuance of a new DPEIR to address these and comments made by others.